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July 25, 2025

VIA CM/ECF

Hon. Stacey D. Adams, U.S.M.J.
United States District Court, District of New Jersey
Frank R. Lautenberg Post Office and Courthouse
2 Federal Square
Newark, NJ 07101

Re: Straus v. Straus
Civil Action No. 25-cv-02606-MCA-SDA

Dear Judge Adams:

This firm represents Defendants Daniel E. Straus; Care One, LLC; Care Realty, LLC; Care One Management, LLC; Care Services, LLC; Care Solutions, LLC; Partners Pharmacy, LLC; Ascend Hospice; Bridgecare, LLC; Total Care, LLC; and Straus Group, LLC (collectively, the “Straus Defendants”) in connection with the above-referenced matter. We write pursuant to L. Civ. R. 6.1(a) and Your Honor’s Individual Preferences to respectfully request an extension through September 30, 2025 for the Straus Defendants and Defendant Emily Vazquez (“Defendant Vazquez,” together with the Straus Defendants, “Defendants”) to respond to the Complaint. Counsel for all parties to this action have consented to Defendants’ request.

By way of background, Plaintiffs Elizabeth S. Straus, Dr. Brandon Howard, and Meagan LaDue (“Plaintiffs”) filed the Complaint on April 10, 2025. (D.E. 1.) Based on the executed summonses and waivers of service filed on the docket, Defendants’ responsive pleadings are due on or before July 29, 2025 (D.E. 20-23) and September 2, 2025 (D.E. 12, 19).

Defendants collectively request an extension of time, up to and including September 30, 2025, to answer or otherwise respond to the Complaint. This is Defendants’ first request for an extension. Counsel for all parties to this action have consented to Defendants’ request and have executed the stipulation and proposed consent order attached to this letter as **Exhibit A**. Accordingly, we respectfully ask the Court to So Order the stipulation or this letter at its earliest convenience.

Respectfully submitted,

/s/ Sean Mack

Sean Mack, Esq.

EXHIBIT A

Glavin PLLC

Rita Glavin, Esq. (*pro hac vice* forthcoming)
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Management, LLC; Care Services, LLC; Care
Solutions, LLC; Partners Pharmacy, LLC;
Ascend Hospice; Bridgecare, LLC; Total Care,
LLC; and Straus Group, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ELIZABETH S. STRAUS, DR. BRANDON
HOWARD, and MEAGAN LADUE,

Plaintiffs,

v.

DANIEL E. STRAUS (In His Individual and
Professional Capacities); CARE ONE LLC;
EMILY VAZQUEZ, (In Her Individual and
Professional Capacities); CARE REALTY,
LLC; CARE ONE MANAGEMENT, LLC;
CARE SERVICES, LLC; CARE
SOLUTIONS, LLC; PARTNERS
PHARMACY, LLC; ASCEND HOSPICE;
BRIDGECARE, LLC; TOTAL CARE, LLC;
STRAUS GROUP, LLC; JOHN DOES 1-10;
AND XYZ CORPS. 1-10,

Defendants.

Civil Action No. 25-cv-02606-MCA-SDA

**STIPULATION AND CONSENT ORDER
EXTENDING DEFENDANTS' TIME TO
FILE RESPONSIVE PLEADING**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that the time for all Defendants to answer or otherwise respond to the Complaint (D.E. 1) is extended up to and including September 30, 2025.

Dated: July 25, 2025

BARON SAMSON LLP

PASHMAN STEIN WALDER HAYDEN, P.C.

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Attorneys for Defendant Emily Vazquez

SO ORDERED:

Hon. Stacey D. Adams
United States Magistrate Judge